Date: 1/2/07

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS
James Frey	Robert Sorrentino
1/2/12	Senior Vice President, Taxes, Random House, Inc.
Date: 1/2/07	Date:
James Frey	Robert Sorrentino
Big Jim Industries, Inc.	
Date: 1/2/07	President, Doubleday & Company, Inc.
Date: 1 / 2 / 0 7	Date:
- Many	
Maya Frey	Robert Sorrentino
	Vice President, Taxes, Random House VG, Inc.
Date: 1/2/07	Date:
- Pull Negry	
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
.1 .	Touse Dejendants

Date:____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:	FOR THE RANDOM HOUSE DEFENDANTS.
James Frey	Robert Sorregano Senior Vice President, Taxes, Random House, Inc.
Date:	Date: 12/15/06
James Frey	Robert Sorrenting
Big Jim Industries, Inc.	President, Doubleday & Company, Inc.
Date:	Date: 12/15/06
Maya Frey	Robert Sorrentino Vice President, Taxes, Random House VG, Inc.
Date:	Mark B Blocker
Derek J. Meyer	Mark B. Blocker
McDermott Will & Emery LLP	Sidley Austin LLP
227 West Monroe Street, Suite 4400	One South Dearborn
Chicago, Illinois 60606	Chicago, Illinois 60603
Attorney for the Frey Defendants	Attorney for the Random House Defendants
Date:	Date: 12/28/2006

FOR	THE	PI A	INT	FFC
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Plaintiff Marcho Vedral	Michele Snow
Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co-Load Class Counsel Atturney for Plaintiff Michele Snow
Date: 12-6-06	Date: 12-6-06
Plaintiff Jennifer Colui Date:	Plantiff Aun Marie Strack Date:
Thomas Mulisney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liuison Class Counsel Attorneys for Plaintiff Jennifer Cohn	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chreago, Illinois, 60603 Attorney or Plaintiff Ann Marie Street
Date:	Date:

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury Larry D. Drury Ltd. 205 W. Randolph Street, Suite 1430 Chicago, Illinois 60606	Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plaza, Suite 602
Proposed Co-Lead Class Counsel Attorney for Plaintiff Marcia Vedral	Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co- Lead Class Counsel Attorney for Plaintiff Michele Snow
Plaintiff Diane Marolda	Plaintiff Ann Marie Strack
Date: 12/1/06	Date:
Thomas Mullaney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Diane Marolda	Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Mouroe Street, Suite 1300 Chicago, Illinois 60603 Attorney or Plaintiff Ann Marie Strack
Date: 12.5.200	Date:

FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral	Plaintiff Michele Snow
Date:	Date:
Larry D. Drury	Even I Swith Francis
Larry D. Drury Ltd.	Evan J. Smith, Esquire Brodsky & Smith, LLC
205 W. Randolph Street, Suite 1430	Two Bala Plaza, Suite 602
Chicago, Illinois 60606	Bala Cynwyd, PA 19004
Proposed Co-Lead Class Counsel	(610) 667-6200
Attorney for Plaintiff Marcia Vedral	Proposed Co- Lead Class Counsel
	Attorney for Plaintiff Michele Snow
Date:	Date:
Plaintiff Jennifer Cohn	Plaintiff Ann Marie Strack
Date:	Date: 12-8-06
Date	Date. 128-06
	That I A
Thomas Mullaney	Thomas A. Zimmerman, Jr.
708 Third Avenue, Suite 2500	Zimmerman and Associates, P.C.
New York, New York 10017	100 West Monroe Street, Suite 1300
Phone: (212) 223-0800	Chicago, Illinois 60603
Liaison Class Counsel	Attorney or Plaintiff Ann Marie Strack
Attorneys for Plaintiff Jennifer Cohn	
Date:	Date: 12-11-2006

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Plaint I Jimmy Gloyd	Plaintiff Jill Giles	
Day 1/4/AT	Date:	
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Alan S. Ripka	Alan J. Statman	
Napoli Bern Ripka LLP	Colleen M. Hegge (of counsel)	
115 Broadway	2900 Chemed Center	
New York, New York 10006	255 East Fifth Street	
Attorney for Plaintiff Jimmy Floyd	Cincinnati. Ohio 45202 Attorneys for Plaintiff Jill Giles	
Date: December 5, 2006	Date:	
Plaintiff Pilar More	Plaintiff Shera Paglinawan	
Date:	Date:	
Thomas E. Pakenas	Michael David Myers Myers & Company, P.L.L.C.	
Dale and Pakenas 641 W. Lake Street, Suite 400	1809 Seventh Avenue, Suite 700	
Chicago, Illinois 60661	Seattle, Washington 98101	
Attorneys for Plaintiff Pilar More	Attorney for Plaintiff Shera Paglinawan	
Date:	Date:	
Plaintiff Sara Brackenrich		
Date:		
Vincent L. DiTommaso		
DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200		
Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich		

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J. Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date: 11/29/06	Date:
Plaintiff Pilar More Date: 11 / 29/06	Plaintiff Shera Paglinawan Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackenrich Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Dakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich Date:	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles	
Date:	Date:	
Alan S, Ripka	Alan J. Statman	
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115 Broadway	2900 Chemed Center	
New York, New York 10006	255 East Fifth Street	
Attorney for Plaintiff Jimmy Floyd	Cincinnati, Ohio 45202	
	Attorneys for Plaintiff Jill Giles	
Date:	Date:	
Plaintiff Pilar More	Plaintiff Shera Paglinawan	
Date:	Date:	
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	Plaintiff Wendy Shaw Date:	
Date:	Michael David Myers	
3/014	Myers & Company, P.L.L.C.	
	1809 Seventh Avenue, Suite 700	
	Seattle, Washington 98101	
	Attorney for Plaintiff Shera Paglinawan	
CD.	Date:	
Plaint F Sara Brackenrich	<u> </u>	
Date: 20 Nov. 06		
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Plaintiff Jimmy Floyd	Flaintiff Fill Giles
Date:	Date: 12-7-06
Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd	Alan J Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles
Date:	Date: 12-7-04
Plaintiff Pilat More Date:	Plaintiff Shera Paglinawan Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Anorneys for Plaintiff Pilar More Date:	Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date:
Plaintiff Sara Brackentich Date:	
Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sar a Brackenrich Date:	•

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Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	randin fill Giles
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AL	
Alan S. Ripka	
Napoli Bern Ripka LLP	Alan J. Statman
115 Broadway	Colleen M. Hegge (of counsel)
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Attorney for Plaintiff Jimmy Floyd	255 East Fifth Street
	Cincinnati, Ohio 45202
Date:	Attorneys for Plaintiff Jill Giles
Date:	Date:
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Plaintiff Pilar More	Plaintiff Shera Paginawan
Date:	
	Date: 3 Dec. 2002
Thomas E. Pakenas	-
Dale and Pakenas	Plaintiff Wendy Shaw
641 W. Lake Street, Suite 400	welldy Shaw
Chicago, Illinois 60661	Date:
Attorneys for Plaintiff Pllar More	
	11 11 11
Date:	Mint to A My us
	Michael David Myers
	Myers & Company, PLL.C.
	TOO DEVENIN A VANDAGE CO. T. MAA
	The state of the s
	Taborney for Plaintiff Shera Paglinawan
	Date: 12 . 3 . 2006
laintiff Sara Brackenrich	
ate:	
incent L. DiTommaso	
Tommaso & Lubin, PC	

Plaintiff Jimmy Floyd	Plaintiff Jill Giles
Date:	Date:
Alan S. Ripka	Alan J. Statmon
Napoli Bern Ripka LLP	
115 Broadway	Collecn M. Hegge (of counsel) 2900 Chemed Center
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Attorney for Plaintiff Jimmy Floyd	Cincirnati, Ohio 45202
TAD THE SET OF STATE OF	Attorneys for Plaintiff Jill Giles
Date:	Date:
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Plaintiff Pilar More	Plaintiff Shera Paglinawan
Date:	Date:
Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400	Plaintiff Wondy Shaw Date: 2/06
Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More	The state of the s
Date:	Michael David Myers
11	Myers & Company, P.L.L.C.
	1809 Seventh Avenue, Suite 700
	Seattle, Washington 98101
	Assurney for Platnetff Shera Paglinawan
	Date:
Plaintiff Sara Brackenrich	
Date:	
Z.	
/incent L. DiTommaso	
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